

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHARLES E. ANDERSON, Trustee on behalf of
the PAINTERS' DISTRICT COUNCIL NO. 30
HEALTH AND WELFARE FUND

Plaintiff,

V.

CORY DERGANCE and THE LAW OFFICES OF
PETER FERRACUTI, P.C.,

Defendants.

Case No. 08 CV 2522

Judge Zagel

NOTICE OF MOTION

TO: See attached Certificate of Service.

PLEASE TAKE NOTICE that on Tuesday, July 29, 2008, at 10:00 a.m., I shall appear before the Honorable Judge James B. Zagel in the courtroom usually occupied by him at the Dirksen Federal Building, 219 South Dearborn Street, Chicago, Illinois, and then and there present **Plaintiffs' Motion for Default and Default Judgment**, a copy of which, along with its supporting exhibits, is attached hereto.

Respectfully submitted,

/s/ M. Garrett Hohimer
M. Garrett Hohimer
One of Plaintiffs' Attorneys

Marisel Hernandez
M. Garrett Hohimer
Jacobs, Burns, Orlove, Stanton and Hernandez
122 S. Michigan Avenue, Suite 1720
Chicago, IL 60603
(312) 372-1646

CERTIFICATE OF SERVICE

I certify that on July 23, 2008, I electronically filed the foregoing **Notice of Plaintiffs' Motion for Default and Default Judgment** with the Clerk of the court using the CM/ECF system; however, there are no attorneys of record who will be sent electronic notification of such filing.

I certify that on July 23, 2008, I caused a copy of the attached **Notice of Plaintiffs' Motion for Default and Default Judgment** to be sent by prepaid overnight delivery service, to:

Cory Dergance
145 9th Street
LaSalle, IL 61301

The Law Offices of Peter F. Ferracuti, P.C.
110 East Main Street
Ottawa, IL 61350

/s/ M. Garrett Hohimer